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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,)	No. CR-07-70489 MAG
)	
12 Plaintiff,)	MOTION AND PROPOSED ORDER
)	FOR TEMPORARY MODIFICATION
13 v.)	OF BAIL CONDITIONS PERMITTING
)	DEFENDANTS TO TRAVEL TO LAW
14 Patrice RAVEN and Jeanette)	VEGAS
BLAND,)	
)	
15)	
)	Next Date: October 31, 2007 (Judge
16 Defendants.)	Chen)
)	Time: 9:30 a.m.
17)	Court: Honorable Joseph C. Spero

18
19 Defendants Raven and Bland hereby respectfully request this Court to issue an order modifying
20 their bail conditions, which would permit the defendants to travel to Las Vegas for plans they
21 arranged prior to their arrests on this matter. The proposed dates of travel are November 1, 2007
22 through November 4, 2007. United States Pretrial Services Officer Hence Williams has been
23 contacted by defense counsel about this request, and has no objection to the request. USPSO
24 Williams will be provided with an itinerary detailing flight and hotel information. The defendants
25 will be back in the district no later than the evening of November 4, 2007.

26 Assistant United States Attorney Allison Marston Danner has been contacted by defense

1 counsel, and has no objection to the request.

2 WHEREFORE, defendants Raven and Bland respectfully request this Court to grant the
3 temporary modification, and allow the defendants to travel to Las Vegas between November 1, 2007
4 and November 4, 2007.

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6 IT IS SO STIPULATED

7 DATED: 10/22/07

/S/
ELIZABETH M. FALK
Assistant Federal Public Defender

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10 DATED: 10/22/07

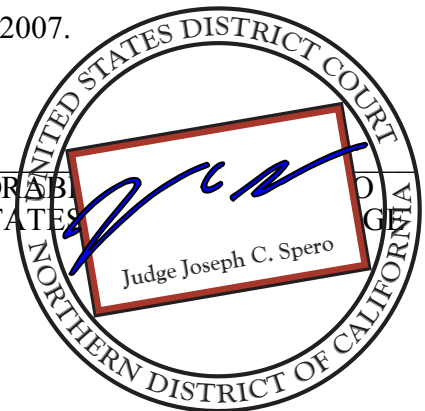
/S/
ALLISON MARSTON DANNER
Assistant United States Attorney

11
12
13 **[PROPOSED] ORDER**

14
15 GOOD CAUSE SHOWN, it is hereby ORDERED that the bail conditions of Defendants
16 PATRICE RAVEN and JEANETTE BLAND be temporarily modified to permit them to travel to
17 Las Vegas on Thursday, November 1, 2007, provided that the defendants return to the Northern
18 District of California no later than the evening of November 4, 2007.

19
20
21 Dated: 10/23/7

22 THE HONORABLE
23 UNITED STATES



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